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8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
9 STATE OF CALIFORNIA
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12 In the Matter of) FPPC No.: 99/632
13)
14 CITIZENS FOR AN EDUCATED AMERICA,) STIPULATION, DECISION and
15 NO ON 227; AND DAVID GOULD;) ORDER
16 Respondents.)
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18 Complainant Mark Krausse, Executive Director of the Fair Political Practices Commission, and
19 Respondents, Citizens for an Educated America, No on 227 and David Gould, hereby agree that this
20 Stipulation will be submitted for consideration by the Fair Political Practices Commission at its next
21 regularly scheduled meeting.

22 The parties agree to enter into this Stipulation to resolve all factual and legal issues raised in this
23 matter, and to reach a final disposition without the necessity of holding an administrative hearing to
24 determine the liability of Respondents.

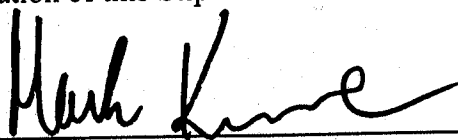
25 Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural
26 rights set forth in sections 83115.5 and 11503 of the Government Code, and in section 18361 of Title 2
27 of the California Code of Regulations. This includes, but is not limited to, the right to personally appear
28 at any administrative hearing held in this matter, to be represented by an attorney at Respondents' own
expense, to confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to

1 testify at the hearing, and to have an impartial administrative law judge preside over the hearing as a
2 hearing officer.

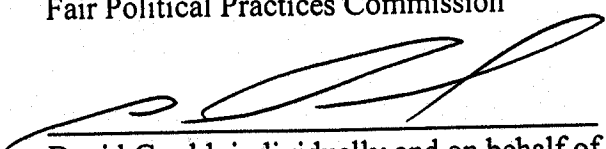
3 It is further stipulated and agreed that Respondents committed four violations of the Political
4 Reform Act by failing to properly disclose and itemize \$131,407 in accrued expenses and \$1,358,329 in
5 sub-vendor payments, in violation of Government Code sections 84211, subdivision (k), and 84303, as
6 described in Exhibit 1, which is attached hereto and incorporated by reference as though fully set forth
7 herein. Exhibit 1 is a true and accurate summary of the facts in this matter.

8 Respondents agree to the issuance of the Decision and Order, which is attached hereto.
9 Respondents also agree to the Commission imposing upon them an administrative penalty of Eight
10 Thousand Dollars (\$8,000). A cashier check from Respondents in said amount, made payable to the
11 "General Fund of the State of California," is submitted with this Stipulation as full payment of the
12 administrative penalty, and shall be held by the State of California until the Commission issues its
13 Decision and Order regarding this matter. The parties agree that in the event the Commission refuses to
14 accept this Stipulation, it shall become null and void, and within fifteen (15) business days after the
15 Commission meeting at which the Stipulation is rejected, all payments tendered by Respondents in
16 connection with this Stipulation shall be reimbursed to Respondents. Respondents further stipulate and
17 agree that in the event the Commission rejects the Stipulation and a full evidentiary hearing before the
18 Commission becomes necessary, neither any member of the Commission, nor the Executive Director,
19 shall be disqualified because of prior consideration of this Stipulation.

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21 Dated: 21 June 2002


Mark Krausse, Executive Director
Fair Political Practices Commission

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24 Dated: 6-20-02


David Gould, individually and on behalf of Citizens for an
Educated America, No on 227, Respondents

1 **DECISION AND ORDER**

2 The foregoing stipulation of the parties “In the Matter of Citizens for an Educated America, No
3 on 227; and David Gould; FPPC No. 99/632,” including all attached exhibits, is hereby accepted as the
4 final decision and order of the Fair Political Practices Commission, effective upon execution below by
5 the Chairman.

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7 IT IS SO ORDERED.

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9 Dated: _____

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11 Karen A. Getman, Chairman
12 Fair Political Practices Commission
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